

4-30-93
8.7.22.4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
SEATTLE, WASHINGTON

IN THE MATTER OF:)

HYLEBOS WATERWAY OF THE)
COMMENCEMENT BAY NEARSHORE/)
TIDEFLATS SUPERFUND SITE)

Proceeding under Section 122(g))
of the Comprehensive Environmental)
Response, Compensation and)
Liability Act as amended,)
42 U.S.C. § 9622(g))

U.S. EPA Docket No. _____

AFFIDAVIT OF DANIEL L.
GOODELL

This affidavit is prepared in relation to the request of Jones-Goodell Corporation and J & G Investments, a Washington partnership, along with about 25 other firms and individuals on the Hylebos Waterway, for an early de minimis settlement of CERCLA liability at the Hylebos Waterway.

Jones-Goodell Corporation was listed as a PRP in relation to property at 1690 Marine View Drive, Tacoma, Washington 98422. Jones-Goodell Corporation occupies that site as a lessee. The lessor is J & G Investments. J & G Investments itself does not conduct operations at the site. J & G Investments' address is 4812 East 64th Street, Tacoma, Washington 98443.

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AFFIDAVIT OF DANIEL L. GOODELL - 1
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J & G Investments also was listed as a PRP. Jones-Goodell Corporation received a letter notifying it of its PRP status dated April 24, 1989. J & G Investments was listed as a PRP but never received the April 24, 1989 letter or any other letter from EPA. Jones-Goodell Corporation responded to EPA's April 24, 1989 letter with a letter of its own dated May 25, 1989.

Jones-Goodell Corporation is a small, family-owned company. The company has occupied its site at 1690 Marine View Drive since 1976. It has occupied that site since the corporation was created.

Jones-Goodell Corporation's business is repair and manufacturing of small vessels. The work has been accomplished in a number of buildings on the site as well as through the use of a marine way and a dock.


Jones-Goodell Corporation generates waste, mainly waste lacquer thinner/toluene/acetone contaminated with paint. These wastes are stored in secure drums, under cover, within a bermed area. These materials are recycled. Any spills or residue from the storage or use of these materials is scraped up, swept up or absorbed in blotter cloths and disposed of through an off-site waste disposal system. Fifty-five gallon drums which contained product, when empty, are retrieved and recycled through Northwest Cooperage.

EPA's April 24, 1989 letter (question 11) asked that Jones-Goodell disclose any spills, leaks or pipeline breaks for hazardous substances or contaminants. There have been no such

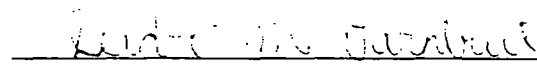
incidents on Jones-Goodell's premises.

Jones-Goodell Corporation should receive an early de minimis settlement of CERCLA liability from EPA. Jones-Goodell has not used the Hylebos Waterway as a waste dumping site. Jones-Goodell always maintained a clean operation and took care not to contaminate the waterway or soil or groundwater on its premises. Jones-Goodell is a small company (between 40-50 employees on the average) and does not have the means to foot a huge bill for cleanup largely created by the actions of others.

J & G Investments also should receive an early de minimis settlement of liability. J & G Investments has been a passive landowner of the 1690 Marine View Drive site since 1976. J & G Investments has had no operations and, thus, has no responsibility for pollutants deposited in the Hylebos Waterway.


DANIEL L. GOODELL

SIGNED AND SWORN TO before me on this 30th day of April, 1993 by Daniel L. Goodell.


NOTARY PUBLIC in and for the State of Washington, residing at Tacoma.
My commission expires: 4-1-95